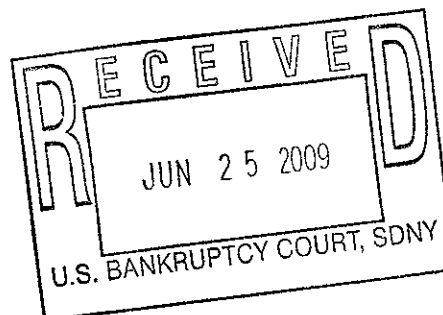


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Attorneys for Mark Buttita, personal representative of Salvatore Buttita

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re	: Chapter 11 Case No.
	:
GENERAL MOTORS CORP., <i>et al.</i>	: 09-50026 (REG)
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO CERTAIN NOTEHOLDERS BY MARK
BUTTITA, AN ASBESTOS CREDITOR AND MEMBER OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF GENERAL MOTORS CORPORATION**

**TO: Andrew N. Rosenberg, Esq.
Brian S. Hermann, Esq.
Margaret A. Phillips, Esq.
Matthew R. Scheck, Esq.
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP**

PLEASE TAKE NOTICE that Franklin Templeton Investments, JMG Capital
Management, LLC, Marathon Asset Management, and Eastbourne Capital Management, LLC

are each hereby requested to respond to the this First Request for Production of Documents ("Request") by submitting a written response to the following and producing the responsive documents, all pursuant to the Local Rules of the United States Bankruptcy Court for the District of New Jersey, and Rule 34 of the Federal Rules of Civil Procedure, made applicable by Rule 7034 of the Federal Rules of Bankruptcy Procedure. Unless otherwise agreed by counsel, written responses should be provided, and responsive documents should be produced, at the New York office of the undersigned counsel, 375 Park Avenue, 35th Floor, New York, NY 10152-3500, before close of business on Friday, June 26, 2009.

Definitions

1. This Request hereby incorporates by reference the standard definitions provided by Rule 7026-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York and Civil Rule 26.3 of the Local Rules of the United States District Court for the Southern District of New York.

2. "Asbestos Claim" means any claim or demand against GM now existing or hereafter arising, whether or not such claim, remedy, liability, or Demand is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured, whether or not the facts of or legal bases therefor are known or unknown, under any theory of law, equity, admiralty, or otherwise, for death, bodily injury, sickness, disease, medical monitoring or other personal injuries (whether physical, emotional or otherwise) to the extent caused or allegedly caused, directly or indirectly, by the presence of or exposure to asbestos or asbestos-containing products or things that was or were installed, engineered, designed, manufactured, fabricated, constructed, sold, supplied, produced, specified, selected, distributed, released, marketed, serviced, maintained, repaired, purchased, owned, occupied, used, removed, replaced or disposed of by GM, including, without limitation, (i) any claim, remedy, liability, or demand for compensatory damages (such as loss of consortium, wrongful death, medical monitoring, survivorship, proximate, consequential, general, and special damages) and punitive damages; and (ii) any claim under any settlement pertaining to an Asbestos Claim.

3. "Bondholder Representatives" means, collectively and individually, persons or entities who, on behalf of any holders of publicly-issued debt of GM, participated in discussions or negotiations with any of the Sponsors concerning any potential private restructuring of the Debtors or any potential bankruptcy plan of reorganization for the Debtors. "Bondholder Representatives" includes, but is not limited to, the Certain Noteholders.

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Attorneys for Mark Buttita, personal representative of Salvatore Buttita

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re	:
	:
GENERAL MOTORS CORP., et al.	:
	:
Debtors.	:
	:
-----X	


**Chapter 11 Case No.
09-50026 (REG)
(Jointly Administered)**

AFFIDAVIT OF SERVICE


STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Eugenia Benetos, being duly sworn, deposes and says: I am not a party to
within this action, am over 18 years of age and reside in Astoria, New York.

On the 24th day of June, 2009, I caused to be served a First Request For
Production Of Documents To Certain Noteholders By Mark Buttita, An Asbestos
Creditor And Member Of The Official Committee Of Unsecured Creditors Of General
Motors Corporation on the parties listed below by Handy Delivery and/or Federal
Express as designated.


Eugenia Benetos

Sworn to before me this
24th day of June, 2009.


Notary Public
LAUREN KARASTERGIOU
Notary Public, State of New York
No. 01KA4705838
Qualified in New York County
Commission Expires June 12, 2012

VIA HAND DELIVERY:

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VIA FEDERAL EXPRESS:

Court of the Clerk
United States Bankruptcy Court
Southern District of New York
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Honorable Robert E. Gerber
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Mailcode: 480-206-114

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